

FELIX S. LEE (CSB No. 197084)  
flee@fenwick.com  
CHRISTOPHER J. STESKAL (CSB No. 212297)  
csteskal@fenwick.com  
CASEY O'NEILL (CSB No. 264406)  
coneill@fenwick.com  
CLAIRE MENA (CSB No. 339324)  
cmena@fenwick.com  
FENWICK & WEST LLP  
Silicon Valley Center  
801 California Street  
Mountain View, CA 94041  
Telephone: 650.988.8500  
Facsimile: 650.938.5200

JOHN D. TENNERT III (Nevada Bar No. 11728)  
jtennert@fennemorelaw.com  
WADE BEAVERS (Nevada Bar No. 13451)  
wbeavers@fennemorelaw.com  
FENNEMORE CRAIG, P.C.  
7800 Rancharrah Parkway  
Reno, NV 89511  
Telephone: 775.788.2212  
Facsimile: 775.786.1172

Attorneys for Plaintiff  
TETSUYA NAKAMURA

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

TETSUYA NAKAMURA,  
  
Plaintiff,  
  
v.  
  
SUNDAY GROUP INCORPORATED, *et al.*,  
  
Defendants.

SUNDAY GROUP INCORPORATED AND  
TOSHIKI (TODD) MITSUISHI  
  
Counterclaimants,  
  
v.  
  
TETSUYA NAKAMURA,  
  
Counterdefendant.

Case No.: 2:22-cv-01324-MMD-EJY

DECLARATION OF FELIX S. LEE IN  
SUPPORT OF REPLY MEMORANDUM IN  
SUPPORT OF MOTION TO DISMISS  
COUNTERCLAIMANTS' AMENDED  
COUNTERCLAIMS

1 I, Felix S. Lee, hereby declare:

2 1. I am an attorney admitted *pro hac vice* to practice before this Court and a partner  
3 at the law firm of Fenwick & West LLP, which represents Dr. Tetsuya Nakamura, the plaintiff  
4 and counterdefendant in this action. I have personal knowledge of the matters set forth in this  
5 declaration and, if called upon to do so, could and would testify competently as to the matters  
6 described below.

7 2. Attached hereto as **Exhibit A** is the First Amended Complaint in *Local Ad Link,*  
8 *Inc. v. AdzZoo, LLC*, Case No. 2:09-cv-01564-RCJ-LRL, in the United States District Court for  
9 the District of Nevada (ECF No. 21-2). Exhibit A was the operative complaint before the Court  
10 in the decision *Local Ad Link, Inc. v. AdzZoo, LLC*, 2009 WL 10694069 (D. Nev. Dec. 15, 2009),  
11 a decision cited by the parties to this case.

12  
13 I declare under penalty of perjury under the laws of the United States of America that the  
14 foregoing is true and correct.

15  
16 Executed this 12th day of January 2024

17  
18 By: /s/ Felix S. Lee  
19 Felix S. Lee  
20  
21  
22  
23  
24  
25  
26  
27